

August 2020

Dr Karen Hooper
Principal Commissioner
Queensland Productivity Commission
PO Box 12112
BRISBANE QLD 4003
Delivered by email to enquiry@qpc.qld.gov.au



Dear Dr Hooper,

Queensland Productivity Commission (QPC) Inquiry into the National Disability Insurance Scheme (NDIS) market in Queensland

QAIHC, as the peak body for the Aboriginal and Torres Strait Islander Community Controlled Health Organisations (ATSICCHOs) in Queensland, presents the collective views of our Sector to inform the Inquiry into the National Disability Insurance Scheme (NDIS) market in Queensland.

QAIHC was established in 1990 by Aboriginal and Torres Strait Islander leaders within the community-controlled health Sector (the Sector). We are a leader in Aboriginal and Torres Strait Islander health and a voice for our Members; the 26 ATSICCHOs, two regional bodies and 14 Affiliates.

ATSICCHOs provide culturally appropriate, holistic, comprehensive, primary health care services to local Aboriginal and Torres Strait Islander communities across more than 60 clinics in Queensland. This includes providing support and services to people with a disability. They support regional economies and encourage whole of community wellbeing through creating local jobs and ensuring locally designed services.

As recognised on page 10 of the Inquiry's Issues Paper, there are many barriers to Aboriginal and Torres Strait Islander peoples in accessing disability services, including "*social marginalisation, a reluctance to approach government agencies, cultural attitudes towards disability, services that are not mindful of cultural differences; limited understanding about what the NDIS is, what it is for and how to access and use it; and a lack of disability services in remote communities.*" This can be confirmed through QAIHC's Members' regularly reporting these concerns to QAIHC.

Disability service design, provision and access needs to be improved for Aboriginal and Torres Strait Islander peoples living in Queensland. QAIHC continues to be a strong advocate for improvements to the NDIS to make it fit for purpose for Aboriginal and Torres Strait Islander peoples. However, reforms have not reflected QAIHC's recommendations that have been provided to the NDIA.

For your information and action, a position statement which addresses a number of the issues the QPC has been commissioned to investigate is attached.

QAIHC would like to thank the QPC for the opportunity to comment and would welcome the opportunity to meet with you to discuss this further.

Yours sincerely,

Glen Reters
Chief Executive Officer (Acting)
Queensland Aboriginal and Islander Health Council

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QAIHC calls for equity for all Aboriginal and Torres Strait Islander peoples with a disability

13 August 2020

QAIHC believes that all Aboriginal and Torres Strait Islander peoples with a disability should have:

- access to local, holistic, culturally safe, timely, affordable disability support services
- health literacy, or access to a carer who has health literacy, to enable informed and confident decision making for themselves and their family.

The problem

Aboriginal and Torres Strait Islander peoples face disproportionate health challenges compared with those faced by other Australians. These health challenges are compounded and intrinsically linked with disability where inadequately treated or continuing illness may result in, or further complicate, lifelong disability. Aboriginal and Torres Strait Islander peoples are 1.8 times more likely to have a disability and it is nearly twice as likely to be severe.ⁱ

The transition of disability support services from the State to Commonwealth since 2016 has not considered the specific and distinct needs of Aboriginal and Torres Strait Islander peoples.ⁱⁱ The failings of the National Disability Insurance Scheme (NDIS) can be clearly seen through NDIS data which shows that uptake for Aboriginal and Torres Strait Islander peoples is below predicted rates.ⁱⁱⁱ

The National Disability Insurance Agency (NDIA) has not responded to QAIHC's concerns about the lack of Aboriginal and Torres Strait Islander culturally safe and specific disability services, and the low level of NDIS participation by Aboriginal and Torres Strait Islander peoples.^{iv}

Aboriginal and Torres Strait Islander Community Controlled Health Organisation's (ATSICCHO's) ability to respond to their clients and community is impacted by the following barriers:

System level barriers:

- population data availability to inform service and location needs and planning
- institutional racism and unconscious bias against Aboriginal and Torres Strait Islander peoples in policy and process design
- transparency of NDIA's systems and supports available and how to navigate barriers
- support for ATSICCHO's capacity building and funding for adequate service access.

Thin market barriers:

- funding models to provide culturally safe services particularly in rural and remote areas
- access to allied health and specialist services
- service provider infrastructure to deliver services adequately.

Individual barriers:

- understanding of disability and self-awareness
- cultural barriers to NDIS access
- cultural barriers to receiving NDIS services.

QAIHC Position Statement

Disability



The solution

To address these problems the NDIA must work in partnership with the ATSIICHO Sector. This will ensure that disability services are equitable, holistic and incorporate the physical, social, emotional, and cultural wellbeing of individuals and their communities.

QAIHC, as a member of the Coalition of Peaks, a government partner of the Closing the Gap Agreement 2020-2030, suggest that the Australian Government and other key stakeholders embed the Closing the Gap priority reforms into the NDIS.^v Governments need to share decision making with ATSIICHOs and support their capability to co-commission, co-design, co-locate and co-evaluate disability support for Aboriginal and Torres Strait Islander peoples within ATSIICHOs.

Implementing QAIHC's recommendations will create essential improvements for Aboriginal and Torres Strait Islander peoples with a disability in Queensland.

Recommendations

1. The NDIA, Department of Social Services (DSS) and the Queensland Department of Communities, Disability Services and Seniors formally recognise, incorporate and mandate for:
 - a. Genuine partnership with the ATSIICHO Sector for the provision of disability services
 - b. Preferred provider status for ATSIICHOs to deliver disability services, either a restrictive selection process or a non-competitive restrictive selection process, supported by QAIHC.
2. The NDIA conduct a thorough review of the NDIS systems (policy, procedures, programs and funding models) in partnership with Aboriginal and Torres Strait Islander peoples and QAIHC to understand where gaps are present, and address institutional racism failings in a timely manner.
3. The NDIA resource QAIHC to conduct community needs assessments (data review, consultations with ATSIICHOs, stakeholders including consumers) to inform pilot projects that improve Aboriginal and Torres Strait Islander peoples' access to the NDIS.
4. The NDIA and DSS fund the ATSIICHO sector to develop culturally safe and suitable resources to help clients and the wider community understand disability and the NDIS (services available and how to access them).
5. Health Workforce Queensland and the NDIA establish a Queensland Aboriginal and Torres Strait Islander disability workforce target and support the development of new and existing disability workforce within ATSIICHOs.

For further information

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ⁱ AIHW (2019) Disability support for Indigenous Australians Snapshot <https://www.aihw.gov.au/reports/australias-welfare/disability-support-for-indigenous-australians>
AIHW (2017) Aboriginal and Torres Strait Islander Health Performance Framework 2017 report: Queensland, <https://www.aihw.gov.au/reports/indigenous-health-welfare/health-performance-framework-2017-qld/contents/table-of-contents>

ⁱⁱ QAIHC and its members have invested substantial time since October 2018 in understanding community needs, facilitating workshops including the NDIS and the ATSIICHO Sector Workshop attended by NDIA Branch Manager for Communities of Practice, National Disability, Acting Director for Workforce Policy, NDIS Market oversight branch, Commonwealth Department of Social Services and the NDIA Director of Queensland Provider and Market Engagement. QAIHC has also worked with the NDIA Director of Community and Mainstream Engagement Branch, contributed submissions to the Thin Market pricing review and supported NACCHO's submissions to NDIA. Despite this advocacy, change has not incorporated feedback from community and systems remain biased.

ⁱⁱⁱ COAG (2019) Disability Reform Council Performance Report – National, 31 December 2019.

^{iv} Examples of advocacy include: QAIHC Submission (April 2019) Royal Commission: "Health Care for people with cognitive disability" <https://www.qaihc.com.au/media/37598/200406-submission-health-care-for-people-with-cognitive-disability-v11-final-20200407.pdf>; QAIHC Report (2019), NDIS for the ATSIICHO Sector Workshop <https://www.qaihc.com.au/media/37447/qaihc-ndis-for-the-atsiccho-sector-workshop-report-20-feb-2019-published-19-jul-2019-final.pdf>; QAIHC Report (2015), NDIS. <https://www.qaihc.com.au/media/1061/qaihc-national-disability-ins-scheme-doc.pdf>

^v Joint Council on Closing the Gap (2020) Closing the Gap National Agreement <https://coalitionofpeaks.org.au/priority-reforms/>